



August 7, 2017

To Whom it may concern:

We are a WISP that specializes on delivering high speed broadband internet to residents that live miles from wireline infrastructure. Many of our customers have access to wireline services but need the more speed and reliability that we offer. We have one town that has less than 430 population and we offer them service that can reach 100/25mbps.

We currently have around 2,100 business and residential customers here in rural Southwest Wyoming. The three main counties we service have a combined population of less than 50,000 people. We offer services that range from 5mbps to 100mbps.

We strongly support Petition RM-11791

One of our largest challenges of providing service to our market is trying to keep up with customer demand with limited shared spectrum. A prime example is when a customer has our 20mbps package and buys a new router. That router happens to default to a 160mhz channel and be overlapping with the antenna on the house. The customer now barely gets 2mbps because he is causing self interference and believes that the service is terrible. Having a separate "lightly Licensed" spectrum specifically for P2MP would give the customer the ability to use all of the 5ghz band for internal wireless and allow us to get them reliable high speeds of 100mbps, 250mbps, 500mbps, 750mbps, and even 1gbps.

A very limiting factor right now is that, even in this very rural area, there are so many non-coordinated, non-intelligent radio equipment signals that fight with each other and our equipment in the unlicensed spectrum. In order for us to currently offer 50-100mbps, we need to install dedicated links. This prohibits how many people can have this service as it takes a dedicated radio at the tower site that no one else uses. And this is needed to overcome the interference.

We do not have the large capital or ability to spend hundreds of thousands to billions of dollars to purchase the spectrum. We care about these people who are neglected by all the other large companies because it is not profitable for them to care about the 50,000 people we have tucked away in our little corner of the state of Wyoming.. With a modest licensing fee per access point \$250-\$1,000, we could offer gig speed of 25mbps to 1gbps for around \$30 - \$200/mo.



We believe that if this rule change happens it will enable millions of rural residents across the nation to have access to 100mbps to 1gbps that they cannot currently access. Because of the lack of the necessary economies of scale, this access will never occur if the spectrum is auctioned off, as it will be purchased by large companies who have the cash available to offer the high bids necessary to secure the desired speeds. Additionally, the larger companies will continue to offer their services to the urban and suburban areas, continuing to ignore the much needed access to wireless services in rural areas. The rural areas will never grow population centers necessary for the large companies to fully invest. That is why smaller companies specialize in this targeted market. Offering this spectrum through a licensing procedure will ensure that the rural markets needs are addressed,; that smaller companies will have the ability to fund access to the spectrum, and that the necessary desired speeds will be accomplished.

Thank you for your time.

Sincerely,

David Jones  
NGLConnection Network department